

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

JANE DOE
Plaintiff

VS.

EDINBURG CONSOLIDATED
INDEPENDENT SCHOOL DISTRICT
Defendant

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CIVIL ACTION NO. 7:19-CV-00309
(JURY REQUESTED)

**DEFENDANT'S EDINBURG CONSOLIDATED INDEPENDENT SCHOOL DISTRICT
SUPPLEMENTAL RESPONSES TO PLAINTIFF'S SECOND SET OF REQUEST FOR
PRODUCTION**

To: Plaintiff by and through her attorney of record:

Anthony G. Buzbee
Cornelia Brandfield-Harvey
The Buzbee Law Firm
600 Travis, Suite 7300
Houston, Texas 77002

COMES NOW, EDINBURG CONSOLIDATED INDEPENDENT SCHOOL DISTRICT, Defendant in the above-styled and numbered cause and pursuant to Rule 196 of the Texas Rules of Civil Procedure attached hereto makes the following supplemental responses and objections to Plaintiff's Second Set of Request for Production. Defendant reserves the right to supplement, modify or amend the information provided below.

Signed on **February 25, 2020.**

Respectfully submitted,

ESPARZA & GARZA, L.L.P.

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on **February 25, 2020**, a true and correct copy of the foregoing **Defendant's Edinburg Consolidated Independent School District Supplemental Responses to Plaintiff's Second Set of Request for Production** has been served on all attorneys of record as noted below:

Via E-Mail

Anthony G. Buzbee

Cornelia Brandfield-Harvey

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Via E-Mail

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Edinburg, Texas 78539

By: /s/ Eduardo G Garza

Eduardo G Garza

**SUPPLEMENTAL RESPONSES TO SECOND REQUESTS FOR PRODUCTION TO
DEFENDANT EDINBURG CISD**

28. The affidavit provided to Ms. Culberson and/or an officer regarding Badillo's inappropriate conduct towards another female student in 2017.

RESPONSE:

Please see Exhibit N.